



**Response to RIDEM Comments  
on the Site 09 (Allen Harbor Landfill)  
Revised Draft Final Proposed Plan  
NCBC Davisville**

**Contract No. N62472-92-D-1296  
Contract Task Order No. 0046**

*Prepared for*

**Department of the Navy  
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**Navy Response to RIDEM Comments dated 7 January 1997  
on the Site 09 (Allen Harbor Landfill)  
Revised Draft Final Proposed Plan dated 23 December 1996**

**COMMENT: 1.**      Page 1, Column 2, Second Bullet.

This bullet states that a multimedia cap will be constructed consisting of multiple soil layers and an impermeable layer. Please rewrite this bullet to state that where the cap will be constructed it will be built to RCRA C standards.

**RESPONSE:**      The recommendation has been incorporated to indicate that the cap will be constructed to meet the substantive requirements of federal and state laws.

**COMMENT: 2.**      Page 2, Column 1, 4th Bullet.

This bullet notes that as part of the institutional controls, appropriate deed notification regarding groundwater use would be provided. Please rewrite this aspect to state that deed restrictions would be implemented to prevent the use of groundwater.

This bullet also notes that a fence would be placed along the eastern side of Sanford Road. Given that the Town of North Kingstown has expressed an interest in using this property the fence would preclude utilization of the surface of the landfill. From the State's perspective the purpose of the fence is to prevent individuals from coming into contact with the gas vents that would be constructed. The State is willing to accept fencing around the gas vents thereby negating the need to fence in the entire landfill. This would then make the landfill surface available for use by the Town.

**RESPONSE:**      "Deed notifications" has been changed to "land use restrictions which may include deed restrictions". The reference to constructing a fence along Sanford Road has been removed as recommended. Fencing around landfill gas vents is a design detail which is covered by the first bullet on page 2 ("construct an appropriate landfill gas venting/management system").

**COMMENT: 3.**      Page 2, Column 1, 6th Bullet.

This bullet states that the culvert under Sanford Road would be repaired or relocated. Based on some initial analysis and previous discussions we may not want to repair this culvert due to salinity

**concerns in the groundwater underneath the landfill. Please change this statement to reflect that if it is found to be appropriate, as a result of the total design, then it will be done.**

**RESPONSE:** The discussion of the culvert repair/replacement has been removed from the PRAP while recognizing that drainage of the wetlands to the west of Sanford Road is necessary and will be evaluated during the design phase. Redirection of the outfall may be required to reduce potential for scouring of the landfill toe.

**COMMENT: 4.** Page 4, Findings of the Field Investigations, Paragraph 2.

**This paragraph references the geostatistical analysis and infra-red photography studies that were done by the Navy as reasons for not providing groundwater containment. RIDEM does not agree with the findings of these studies as noted in our 11 December 1996 letter commenting on said studies. Therefore, please remove these statements from the text. To answer the question of where groundwater, both deep and shallow, is moving geological information about the harbor will be required.**

**RESPONSE:** The phrases will remain in the document as they are considered to be relevant to the decision to implement Alternative 3 rather than Alternative 4. They will be modified to establish that this is the Navy's belief.

**COMMENT: 5.** Page 4, Risk Evaluations, Second Column, Bullet 2.

**Please change RIDEM closed Allen Harbor to shellfishing in 1984 prior to completion of the HHRA to RIDEM closed Allen Harbor to shellfishing in 1984 due to high levels of contaminants found in the shellfish.**

**RESPONSE:** The bullets are identified as conclusions of the HHRA. Accordingly, and to avoid the impression that the closing of Allen Harbor to shellfishing was solely and directly attributable to the landfill, the sentence will be deleted.

**COMMENT: 6.** Page 4, Risk Evaluations, Second Column, Bullets, 3 & 4.

**Both these bullets refer to the use of groundwater as hypothetical. Please note the proposed use under the Community Reuse Plan is for recreational purposes. Therefore, groundwater use is very plausible at this site for water fountain drinking and for showering. As a**

**result, groundwater use restrictions will need to be applied to this site prior to transfer.**

**RESPONSE:** The word "hypothetical" has been removed from the third and fourth bullets.

**COMMENT: 7.** Page 5, Summary of Remedial Alternatives, Column 2, Alternative 2: Soil Cap.

**While it is true, depending upon design, that a soil cap can reduce infiltration it will not reduce it sufficiently to alleviate leachate generation concerns which from the State's standpoint has the potential to affect groundwater. In addition, as we have previously discussed this alternative does not meet ARARs. Both these items should be noted within the discussion of Alternative 2 (Soil Cap).**

**RESPONSE:** The document has been prepared carefully to avoid statements that expose the technical disagreements that have hindered consensus.

**COMMENT: 8.** Page 6, Summary of Remedial Alternatives, Column 1, Alternative 3: Multimedia Cap; Paragraph 1, Last Sentence.

**The last sentence of this paragraph notes some of the details of the remaining components of this alternative. Please change "deed notifications" to "deed restrictions".**

**RESPONSE:** "Deed notifications" has been changed to "land use restrictions which may include deed restrictions".

**COMMENT: 9.** Page 6, Comparison of Alternatives, Column 2, Paragraph 2.

**Please note that the State does not agree with the statement that "groundwater is not a significant pathway" with respect to COCs at the site. The State believes that additional data, particularly geological information, about Allen Harbor is needed to determine what impacts groundwater from the site is having on the surrounding environment.**

**In the spirit of cooperation, the State will allow the Navy to determine the need for groundwater containment based, in part, on the results of the long-term monitoring data. If the results of the long term monitoring show the need for groundwater containment it may be prudent to include the contingency for groundwater containment as part of the remedial design. This could potentially**

**save the Navy and tax payers significant money in the event groundwater containment is required.**

**RESPONSE:** The phrases will remain in the document as they are considered to be relevant to the decision to implement Alternative 3 rather than Alternative 4. They will be modified to establish that this is the Navy's belief.

The BCT agreed at the 13 December 1996 meeting that vertical barriers or a contingency specifically addressing vertical barriers would not be required at this time. Long-term monitoring (LTM) will be performed to demonstrate the effectiveness of the remedy implemented and any further actions will be based on the results of the LTM.

**COMMENT: 10.** Page 7, The Rationale for the Proposed Remedial Alternative, Bullet 1.

Please change "deed notifications" to "deed restrictions".

**RESPONSE:** "Deed notifications" has been changed to "land use restrictions which may include deed restrictions".

**COMMENT: 11.** Page 7, Questions? For More Information..., Bullet 4.

Please change "291 Promenade Street" to "235 Promenade Street".

**RESPONSE:** The address has been corrected as indicated. Also, "Division of Site Remediation" was changed to "Office of Waste Management".